

REMARKS

The present application is a continuation of U.S. Patent Application No. 09/364,689 (the "Parent Case"), which is now abandoned. In a final Office Action mailed on September 15, 2003 in the Patent Case, the Examiner rejected claims 1-4, 6-23, 25 and 27-47 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,490,241 to Mallgren et al. ("Mallgren").

In this amendment, Applicants amend claims 1, 4, 6, 8-10, 12, 13, 16, 18-21, 25, 27, 28, 30, 33, 34, 36, 40-42, 46 and 47, and cancel claims 3, 5, 24, 26, 29 and 44. As a result, claims 1, 2, 4, 6-23, 25, 27, 28, 30-43 and 45-47 are pending. Further examination and review in view of the amendments and remarks below are respectfully requested.

Applicants herein cancel claims 3, 29 and 44 thereby making the Examiner's rejection of these claims moot.

All of the pending claims stand rejected over Mallgren. Applicants respectfully traverse the Examiner's rejections.

Claims 1, 2, 4 and 6-8 include the common features of (1) determining the placement of two gridlines that are each aligned with a separate object, and (2) displaying a select one of these two gridlines in response to the selected object being dragged to a location. Mallgren does not disclose, suggest or teach displaying a gridline in response to the selected object being dragged to a location. Instead, Mallgren merely describes moving grids which must be manipulated by the user with control points. (col. 6, lines 3-16; Figs. 4A-4I).

While Mallgren discloses moving grids, the moving grids are similar to their stationary counterparts. (col. 5, lines 33-35). Furthermore, the moving grids move as a unit, and the origins of the moving grids move in response to placement of a control point. (col. 5, lines 37-39). Thus, Mallgren is limited to displaying and moving grids with an

origin, rather than individual gridlines. In contrast, Applicants' gridline is displayed without attachment to other gridlines, to the placement of a grid, or to a control point.

Mallgren also does not disclose, suggest or teach determining the placement of multiple gridlines, each aligned to one object, then displaying a select one based on a location of a dragged object. Mallgren merely describes an Illustrator Frame which is responsible for the storage of object properties, and geometry algorithms contained in a Graphical Virtual Machine. (col. 8, lines 64-67). Although Applicants' gridlines may interact with algorithms and objects, they are neither object properties nor fixed algorithms as described by Mallgren. Applicants' determining the position of multiple gridlines then displaying one select gridline supports the flexibility of the gridlines. Flexible gridlines facilitate repositioning arbitrarily positioned objects on a display into an arrangement that provides equal spacing between object centerlines.

Claims 9-15, 40 and 41 include the common feature of determining a likely destination for a selected object being moved in a drawing that has two other objects situated on the display so that there is a separation between them, where the likely destination for the selected object is determined so that the distance between the selected object and one of the other two objects is the same as the distance between the two other objects. Mallgren does not disclose, suggest or teach providing an indication of a likely destination as the selected object is moved. Instead, Mallgren merely describes aligning objects by aligning certain points of the objects (col. 6, line 62-col. 7, line 1), and grids that create two-dimensional representations of three-dimensional objects. (col. 19, lines 65-67). Mallgren's grids are specifically tailored for connecting drawing components together in a rigidly constrained orientation such that the orientation itself conveys visual perspective information about the physical attributes of a three-dimensional article. In contrast, Applicants' gridlines facilitate organizing objects on a page into an aesthetic arrangement; and the gridlines are not limited to creating two-dimensional representations of three-dimensional objects.

Claims 16-23 include the common feature of dynamically displaying a temporary gridline that facilitates equal spacing between a plurality of objects while a selected object is moved within a drawing. Mallgren does not disclose, suggest or teach displaying a gridline when a selected object is dragged within a drawing. Instead, Mallgren merely describes an iterative approach whereby a grid is moved each time a new static control point is set by a user. (col. 6, lines 3-16; Figs. 4A-4I). Mallgren's grids are intended to create new objects with geometric interdependencies based on directional constraints. (Abstract; Summary of the Invention, col. 3, lines 29-36).

Claims 25, 27, 28, 30-35, 42, 43 and 45 include the common feature of establishing and displaying temporary gridlines spaced a distance D and a distance $2D$ from a placed object, where D is computed by adding the width of the placed object and a default avenue distance, and the gridlines are displayed as the selected object is moved in the drawing. Mallgren does not disclose, suggest or teach temporary gridlines that are displayed as an object is moved within a drawing, nor determining the placement of temporary gridlines as an object is moved within a drawing. Instead, Mallgren merely describes a moving grid that is limited in that it is only moved each time a user sets a new control point. (col. 6, lines 3-16; Figs. 4A-4I).

Claims 36-39 include the common feature of determining perpendicular gridlines intersecting at a point that indicates a position for a selected object, where the selected object is linearly aligned with two other identified objects, and one of the two identified objects is halfway between the other identified object and the selected object. Mallgren does not disclose, suggest or teach displaying a gridline when a selected object is moved within a display. Instead, Mallgren merely describes grids that are only moved when a static control point is set. (col. 6, lines 3-16; Figs. 4A-4I). In contrast, Applicants' gridlines are flexible gridlines that are individually responsive to the movement of objects on a display. While Mallgren discloses aligning objects so the aligned objects depict a three-dimensional article, Mallgren requires an iterative process where the user sets control points and a grid is moved with each new control point.

Claim 46 includes the feature of a device for displaying two calculated gridlines, one for aligning a selected object with a placed object and one for positioning the selected object at a predetermined distance from the placed object, where the predetermined distance is the distance between this placed object and another placed object. This feature supports positioning gridlines to facilitate organizing objects on a page with equal spacing between multiple aligned objects. Mallgren does not disclose, suggest or teach gridlines that appear as a selected object is moved within the display. Instead, Mallgren merely describes grids that are only moved when a new control point is set by the user. (col. 6, lines 3-16; Figs. 4A-4I). Mallgren's grids, which are distinct from gridlines, provide directional constraints. (Abstract).

Claim 47 includes the feature of perpendicular gridlines intersecting at a point that indicates a position for a selected object so that the object is aligned with and uniformly spaced from other objects previously placed on the page, where at least one of the gridlines be displayed when the selected object is dragged within a certain distance of a gridline. Again, Mallgren does not disclose, suggest or teach displaying a gridline while a selected object is dragged within the drawing. Mallgren is limited to moving a grid when a user sets a new control point. (col. 6, lines 3-16; Figs. 4A-4I). Accordingly, Mallgren does not disclose or suggest the dynamic aspect of displaying a gridline in response to the moving selected object.

Conclusion

In view of the foregoing, Applicants respectfully submit that claims 1, 2, 4, 6-23, 25, 27, 28, 30-43 and 45-47 are allowable and ask that this application be passed to allowance. If the Examiner has any questions or believes a telephone conference would expedite prosecution of this application, the Examiner is encouraged to call the undersigned at (206) 359-8000.

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Respectfully submitted,

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